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EX PARTE OR LATE FILED

January 10, 2019

The Honorable Ajit Pai, Chairman
The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner
The Honorable Geoffrey Starks, Commissioner

Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

**RE: MB Docket No. 05-311. Second Further Notice of Proposed Rulemaking.
Implementation of Section 621(a)(1) of the Cable Communications Policy Act of
1984 as Amended by the Cable Television Consumer Protection and Competition
Act of 1992.**

Dear Chairman Pai and Commissioners O'Rielly, Carr, Rosenworcel, and Starks:

The Vermont Library Association is strongly opposed to the Further Notice of Proposed Rulemaking (FNPRM), which proposes to allow cable companies to deduct the fair market value of a wide range of public benefits from their franchise fee obligations, including Public, Educational, and Governmental (PEG) channel capacity and free or low-cost cable services to educational institutions.

Further, we support the Comments of the Cable Act Preservation Alliance ("CAPA," File ID 1114050901562) and the Reply Comments of our statewide association of PEG Access organizations, the Vermont Access Network, Inc. ("VAN," File ID 112798463855). The presence of our state's 25 PEG Access centers enables residents to watch uniquely local programming about their communities and events and issues of interest to them. These centers provide a vital link between the state's libraries and its' residents through promotion of library activities, video coverage of library speakers and programs, and collaboration on various workshops and other educational opportunities. The loss of this collaboration and support would have a significant impact on the ability of libraries to offer such diverse programming and opportunities to our communities.

We believe that these kinds of activities and services represent the intent of the PEG provisions of the 1984 Cable Act – to enhance local voices, serve local community needs and interests, and strengthen our local democracy. By defining “franchise fee” in an overly broad fashion to include “in-kind” support, the FCC’s proposals will shift the fair balance between cable franchising authorities and cable operators and will force communities to choose between franchise fees and PEG channels – something that was never the intent of the Act.

We appreciate your consideration and hope you will protect PEG Access in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

Cindy Weber
President